

Policies and Tips for Research Proposals and Service Projects

Department of Psychiatry and Behavioral Sciences

Tulane University School of Medicine

Individual faculty perform the day-to-day functions of research studies and service projects, however **the department and university are ultimately liable for the conduct of these projects and expenditure of funds**. There are many issues relevant to the submission and conduct of project proposals in the Department of Psychiatry and Behavioral Sciences. This document was created to summarize in one place the minimum basic requirements and links to resources to address the common issues that arise, and is not meant to be comprehensive.

At the University level, Tulane University has two entities that are authorized to sign-off on funding **applications** – Sponsored Projects Administration (SPA) and the Office of Development. Any project application that will involve research (i.e., requires an IRB approval) must involve SPA authorization. Both SPA and the Office of Development can authorize applications for non-research service projects.

Help

For departmental policies and a starting place for direction on all issues when needed:

Department of Psychiatry and Behavioral Sciences

Michael Scheeringa, Vice Chair of Research.

Jennifer Dhir for budgets.

Candy Legeai, Senior Administrator, for staff and hiring.

For submission and post-award administration of funded projects, and guidance on many issues at the School level:

Sponsored Projects Administration (SPA)

<https://research.tulane.edu/spa>

Tami Jenniskens, Associate Director, often serves as the liaison for our department. SPA assigns other individuals as liaisons from time to time.

For approval of any research study:

Human Research Protection Program

<https://research.tulane.edu/hrpo>

For help to locate and cultivate funding opportunities:

Office of Development, Corporate and Foundation Relations

Their website and links to the current development officer assigned to the School of Medicine can be found [here](#).

See their [FAQ](#) or [routing policy](#) for more details.

University-wide support for all aspects of research:

Giovanni Piedimonte, MD, Vice President for Research (as of August 2019)

John Christie, Executive Director, Office of Research for intellectual property and data sharing agreements.

Institutional Review Board (IRB)

The IRB is under the Tulane Human Research Protection Program (HRPP).

Their Standard Operating Procedures (SOP) is very detailed and has the answers to most of your IRB questions.

IRB applications typically do not need to be submitted prior to submitting a grant application to a funding agency.

IRB applications are submitted electronically through IRBManager (see the HRPP home page). The IRB application requires certification that all key personnel have completed the CITI training on the protection of human research subjects. The link to the CITI training is on the HRPP home page. Per HRPP guidelines, a routing form is required with every initial IRB packet, regardless of whether the project is funded or unfunded (see section on Routing Form below for more details).

All initial applications require an electronic signature from the Chair of the Department or a Chair's delegate per HRPP policy. The Chair has delegated this to the Vice Chair of Research (Dr. Scheeringa). The process to notify Dr. Scheeringa to sign should be automated in IRBManager.

Key Personnel – Because you are required to list “key personnel” on IRB applications and federal grant applications, “Who counts as key personnel?” is a common question. This is defined in Section 12 of the SOP, but it is not very specific. A safe and conservative definition is anybody working on your project on a regular basis. Anyone working on your project on a daily basis and anyone with access to personally-identifiable information are definitely key personnel. Someone who may not be key personnel could be a consultant who interacts with your team infrequently or did a one-time training for your team.

Federal regulations require that IRB and research records are kept at least three years after the close of projects.

Grants and Contracts Application Preparation

Timeline

The Department must review the budget before it can be approved by SPA or the Office of Development. The Department works hand-in-hand with SPA and Development to review applications in multiple ways throughout the process. **At least six weeks before a large, federal grant deadline and at least four weeks before a smaller, foundation deadline, send a draft of a budget to Jennifer Dhir so that she can help review and/or create the budget.** We do not need to know that you *plan* to submit an application because there is nothing yet to review. We need investigators to submit drafts of budgets early so that we have time to work around vacations and other commitments. At this early stage, often only a budget is needed for review. You may send Jennifer a first draft of a line-item budget that you created in Excel or Jennifer will help you create it. As the deadline gets closer, we also need a

draft of the research strategy (or the protocol for service projects) so we understand what department resources are used.

SPA requests at least one week to review grant applications before they will sign off, even for private foundation applications. Your budget should have been reviewed at the Department level well before then. Send your budget, routing sheet, budget narrative (if required by the funding agency), line-item budget spreadsheet, and research plan to our SPA liaison at least one week before the funding agency deadline, and cc Jennifer and Dr. Scheeringa.

Note: **Line-item budget spreadsheets are always required when submitting a grant application.** Even though spreadsheets are not required by some foundations and are not required by federal modular budget proposals, detailed line-item spreadsheets are ALWAYS required by the Department and SPA.

Budgets

Salary is base salary for Tulane employees. Supplemental salary is not allowable on grants.

Fringe Benefit Rate is calculated as a percentage of your base salary. Fringes must be included in your budget for any Tulane employee that will work on the project in order to properly account for the cost of providing benefits to faculty and staff (i.e., health insurance, vacation and sick pay, etc.). The rates are set by the university, are different for faculty versus staff, and tend to change every year.

Rates are available here: <https://research.tulane.edu/node/2870>

Fringe Benefit Rates	FY19
Downtown full-time faculty	18.8%
Downtown full-time staff	25%
Downtown research post doc	14.2%

Note: FY 19 is July 1, 2019 – June 30, 2020.

Direct Costs are costs related to the conduct of the specific project.

Indirect Costs (IDC) are also called Facilities and Administrative costs (F & A). These costs go towards general infrastructure and support staff that are needed for research. The federally-negotiated rates are available at <https://research.tulane.edu/node/2870>. For all non-federal applications, F & A varies by the funding agency. Many foundations allow 10%; some foundations do not allow any. It is the job of each PI to read the funding announcements and know what indirect costs are allowed.

Indirect (F & A) costs on a subcontract: If a Tulane faculty is the PI on a federal award, Tulane can charge indirect costs to a subcontracted site for only the first \$25,000 of direct costs on a project.

Supplies. There are limits on what each funding agency will cover so funding announcements from funding agencies must be examined closely. There are always specific limits on equipment and some agencies require cost sharing. There are many, many existing rules and guidelines of what can and cannot be purchased with research funds. If in doubt, ask if the expense is allowed before making the purchase. For example, general office supplies (e.g., printer paper, ink, pens) are not allowed to be

charged as direct costs on federal grants; these are covered under F & A costs (and purchased from a department account).

What are “general office supplies”? The federal guidance is fairly clear and we think a reasonable interpretation of the federal guidance is that if something would be found in the office of a typical faculty member or staff, then it is probably ordinary, general office supplies and should be provided by the department. If a PI wants to charge a grant for ordinary office supplies, the PI must provide justification as to why ordinary office supplies should be charged as direct costs to a grant and provide assurance that the ordinary office supplies purchased will only be used on a specific grant. If a project warrants non-ordinary expenses, such as bulk mailings, this would be considered allowable as a direct cost, and would need to be accompanied with an explanation. Even if the purchase seems obvious to you, justification is needed because we will be audited and an auditor will ask. Also, if it seems likely that the supplies could be used on another project in the same lab, it would be difficult to defend the purchase as a direct cost in an audit.

Cost share are costs that are not reimbursable under a grant but are incurred at the department level. An example would be the portion of an investigator’s salary that exceeds the federal salary cap. Another example would be equipment that is not paid for by the grant. Voluntary cost shares require approval of the Dean.

Collaborators from outside institutions can be compensated either with a flat fee or % effort of their base salary, depending on their role. Consult with the Department well ahead of time to determine the correct method. Note: “Honorariums” are generally for speaking engagements and do not apply for research grants.

Subcontracts/Agreements

The agreement between the PI’s institution and the funding agency is the main contract. If the PI allocates funds to a person or agency outside of Tulane, a subcontract is needed. You may be considered a subcontractor if you work on someone’s grant from an outside institution. An outside faculty may be considered a subcontractor if they are working on your grant.

When is an agreement needed? An agreement of some form is ALWAYS required in order to transfer funds to outside collaborators. There are no exceptions. Depending on the situation, these may be in the form of “independent contractor” or “vendor” agreements.

Routing Form

The routing form (<https://tulane.app.box.com/s/p8suxz7fxq97503or2sy8wit1cdyszn9>) is a university/SPA form that ensures that budgets are previewed ahead of time, helps to keep relevant staff involved in the steps they need to be involved with, keeps key administrators and offices in the loop, and helps to prevent last-minute surprises.

(Note: The Office of Development does not use a routing form. If you are developing a project with the Office of Development however the department still requires a routing form.)

Note that there is a different routing form for international studies.

Routing forms are submitted to Jennifer Dhir for checking before signing.

The routing form requires both the signature of the PI and the signature of the Vice Chair of Research (the Chair has delegated this task to the Vice Chair of Research). If faculty and/or funds in other departments are involved, the chairs of those departments must also sign the routing form.

Which applications need routing forms? **Every application (research or service project) requires a routing form. This even applies to projects in which no external or internal funds are being requested, and the routing forms stays within the department.**

The only exception may be a “personal services agreement” for your services on an outside research project. Example: A PI in another state wants you to train her research assistants on an assessment technique. You will Skype with the research assistants one time for two hours. This activity does not require a routing form (although it does require a written agreement).

Submitting

Federal grant applications: Once the PI and others have completed the necessary paperwork, the SPA typically is the only authorized unit to submit online.

Private foundation applications: Once necessary paperwork is completed and signatures obtained, the PI typically submits directly to the foundation.

“Authorized Signing Official”

This typically refers to Kathleen Kozar, Director, Sponsored Projects Administration.

The Office of Development, is also able to sign off on corporate and foundation submissions.

Letters of Intent

Letters of intent do not require routing forms unless stipulated by the funding organization. Even if no routing form is required, the department needs to be copied on letters of intent to keep administrators in the loop.

Residents and Medical Students as PI’s

Residents and medical students can submit funding requests as PI’s, but they cannot be authorized to spend funds for accounting purposes. A faculty must assume the role of the PI in order to spend funds that get awarded. For medical students, the faculty is typically the training director.

Residents can be PI’s on IRB applications without faculty involvement. They do not need a faculty advisor. Given the complexity of most research projects, it is strongly encouraged that residents involve a faculty closely in the project and include them as a “key personnel” on the IRB application.

Medical students can be PI’s on IRB applications but they must have a faculty advisor.

Post-Award Administration

Accounts

Funds for each research award are given their own 6-digit account number. Tulane organizes accounts according to a numbering system that is based on the first digit of the account numbers (i.e., an account that begins with 5 is a “5-ledger account”). SPA monitors only 5-ledger accounts.

0-ledger – corpus of endowments

1-ledger – tuition, IDC

2-ledger – medical student-related expenses

3-ledger – auxiliary services

4-ledger - funds through the Office of Development such as income generated from endowments and donations, and dedicated research funds.

5-ledger - research awards from external agencies.

6-ledger - internal funding.

9-ledger – clinical practice

“School source” dollars include 1, 2, 6, and 9.

Spending funds

Tracking the use of funds is a joint effort between the PI, the Department, the University, and, when appropriate, the federal government.

PI’s ought to be aware of whether their expenditures are on track, especially near the end of each grant year.

The PI can view expenses and the amount of funds available at any time in the Tulane Accounting Management System (TAMS).

Tara Desko can provide summaries of how much funds have been spent, and estimates of how much funds remain available at periodic intervals. She can also help you develop a budget forecast or predictive financial model covering multiple grant years, if requested.

Funds that are obligated to a fiscal year cannot be spent after the end of the fiscal year unless the funding agency allows carryover of unobligated funds. The use of carryover funds will often require specific approval from the funding agency. A request to carryover unobligated balances always must be made before the grant year has ended.

Purchase of items with research account funds are processed by Leslie McClain in the chairman’s office. You may opt to purchase supplies with your personal funds when \$100 or less, and then submit the receipts through Concur to be reimbursed from research accounts, however you cannot be reimbursed for sales taxes on these purchases. Tulane is exempt from paying sales tax as a non-profit organization. Standing purchase orders with certain vendors can be set up for repeated purchases.

Travel arrangements (hotel and flight reservations) that are allowed on research grants (e.g., conferences or trainings) must be arranged by PI’s through Concur. Meals, mileage, and incidentals are

reimbursed under the Tulane Travel Policy. State and Federal travel policies may also apply depending on the grant.

There are many, many existing rules and guidelines of what can and cannot be purchased with research funds. **If in doubt, ask if the expense is allowed before making the purchase.**

The Department does not typically authorize credit cards (purchasing cards, or p-cards) for individual research projects.

Participant incentives

As of July 1, 2015, gifts are not allowed to be purchased for research participants. The only incentive allowed is the Tulane ClinCard program. The contact is Rachel Cruthirds, 988-9038, rcruthir@tulane.edu

Certification of effort

Per federal and university policies, faculty effort on research grants are limited to 95% effort because there must be some effort devoted to teaching and service.

PI's, co-investigators, and research assistants **need to be knowledgeable of how their total effort is allocated**. Performing work on one project while being funded by a different project could represent fraud both by the institution and personally. When faculty or staff need to change their percentage effort or switch their effort from one grant to another, this must be coordinated with the PI and Tara Desko in writing. Tara is responsible for maintaining the departmental labor distributions within the accounting system. Individual faculty and staff members working on sponsored projects are required to remain cognizant of how their total effort should be allocated throughout the year. All individuals working on sponsored projects will be required to electronically certify their effort every six months using the Tulane Effort Reporting System, <https://ers.tcs.tulane.edu/GenericERS/custom/index.jsp> . Students do not certify their own effort. Faculty certify for students and residents working on research projects and for terminated employees.

HIPAA and Confidentiality

Any personal health information (PHI) stored on the internet must be on a service that has a business associates agreement (BAA) with Tulane University. Privacy is being taken very seriously by the federal government. Institutions are regularly being fined millions of dollars for failures to follow HIPAA rules.

Tulane Resources

The department has a [webpage](#) devoted to research with news, information about faculty labs, postdoc opportunities, and more

For creation of a website for your lab or project, see the IT department.

Online surveys and data capture:

Many are commercially available. The university has a license for Qualtrics. As of April 2018, each faculty has access to a Qualtrics account with the Tulane single sign on.

RedCap is another online data capture system. Tulane is a member of the RedCap consortium.

Tulane Faculty & Research Database

<http://tfrd.tulane.edu/>

Designed as an initial point of contact to find Tulane collaborators.

Research email listserv

Provides emails of new funding announcements and funding news.

Contact Denise Lovrovich in SPA, dlovrov@tulane.edu

Tulane Neuroscience Program

<http://tulane.edu/sse/neuro/>

The neuroscience program combines faculty from a wide variety of both basic science and clinical departments. The program includes a large number of undergraduate students and masters students and recent graduates who are well-suited to serve as volunteer interns or paid research assistants.

Matas Library

<http://matas.tulane.edu/>

Library staff can set up weekly email Auto Alerts for published abstracts in your interest area.

Access to journals and more.

State Resources

Louisiana Clinical & Translational Science Center (LA CaTS)

<https://www.lacats.org/>

Rachel Cruthirds is the administrator for the LA CaTS grant at Tulane.

Board of Regents, state of Louisiana

<https://web.laregents.org/>

The Regents' Office of Sponsored Programs provides funding for development of programs and young investigators, travel grants, and other activities to support research in Louisiana.